

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

PRIME ECO GROUP, INC., *ET AL.*

DEBTORS.

§
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Case No. 21-32560

(Chapter 11)

OBJECTION TO CONFIRMATION

COMES NOW, Fairview Investment Fund V, LP (“Fairview”), a secured creditor and party in interest, and files this *Objection To Confirmation*, and would respectfully show the Court as follows:

1. Fairview objects to the treatment of its Class 3(d) claim because:
 - a. Fairview’s claim consist of two (2) secured and matured notes, secured by improved real property of the estate. Amortization of these matured notes over ten (10) years is unreasonable, and fails to provide Fairview with the present value of their claim, and it is not fair and equitable treatment under the Code. See 11 U.S.C. § 1129(a)(7); 11 U.S.C. § 1129(b)(2).
 - b. The Plan does not explicitly provide for the retention of Fairview’s liens post-confirmation.
 - c. Due to recent economic factors and the performance of the Debtor throughout this bankruptcy process, it appears confirmation of the Plan is likely to be followed by further need of financial rehabilitation or liquidation.

Dated: August 23, 2022.

Respectfully submitted,

By: /s/ Johnie Patterson
Johnie Patterson
State ID# 15601700

OF COUNSEL:
WALKER & PATTERSON, P.C.
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CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Objection was served upon Margaret McClure, as well as all parties receiving notice through CM/ECF, by electronic transmission on August 23, 2022.

/s/ Johnie Patterson
Johnie Patterson